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**From:** Barr, James (FTA)  
**To:** Matley, Ted (FTA)  
**CC:** Sukys, Raymond (FTA); Bausch, Carl (FTA)  
**Sent:** 12/3/2009 4:00:32 AM  
**Subject:** RE: Honolulu 106 PA  
**Attachments:** Honolulu PA 12\_3\_09 FTA HQ Revise.doc

Ted:

Attached are my revisions to the Draft PA in your December 1 thread. I made revisions and comments based on a general review and in view of the comments of HHF and NTHP. After review, I think that Merritt is less interested in attention to detail than pushing her position. However, a few of her comments have merit – let's see what Blythe says. If you like, do edit mode on this latest revision and we can send it to ACHP and SHPD for final review. We can then follow-up with them on a conference call. But, if the Navy is going to be a Signatory, then we will have to re-figure. We certainly need to straighten this Navy thing out before we finalize. I will ask Faith for the names and numbers of her Navy contacts.

Regarding Spurgeon's thread below: he is at his blowing-smoke-finest in assuming that the SHPD is our equivalent to the Oracle of Delphi and everything she says has to be taken as the indisputable truth. But, he is right in presuming that we-got-what-we-got and there ain't no going back now – particularly to the consulting parties. I have a note on the Attachments of the PA to get the SHPD to confirm that the Attachments are accurate and acceptable.

Jim

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**From:** Matley, Ted (FTA)  
**Sent:** Tuesday, December 01, 2009 7:24 PM  
**To:** Barr, James (FTA)  
**Subject:** FW: Honolulu 106 PA

Hi Jim, Here's the revised PA with the comments from HHF and NTHP included, although not all their comments may be included in the PA. Also attached is the matrix with comments and response for the HHF. We have the other matrix for response to comments from NTHP. If we feel this is enough we can go ahead and try to schedule a meeting with ACHP and SHPO based on this document and these matrixes.

The issue with the maps is convoluted. From what I understand from Honolulu there are no errors in fact but disagreements about what is represented. I told them I didn't understand why this was a big issue, as long as they qualified things, for example if they added lines or removed things they could just add a note saying that these maps do not represent the APE maps as originally concurred with by SHPO. If the group wants a slightly different map as long as it was documented I don't see why this should be a sticking point and they should just agree to it. Let me know what you think especially if you think differently on this.

On the Navy, there is a lot of confusion as well. The story that Faith told me leads to believe that this is similar to the airport, that there are lots of undetermined things hanging out there. A little of it is below, but it appears there are differing interpretations of boundaries and they are unsure if they are taking Navy properties or just using them and the whole question of Navy 106 requirements may still be hanging out there. I think we might need a whole conference call on the Navy but if you want the story before I get back into the office next week give Faith a call and her the saga.

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**From:** Spurgeon, Lawrence [mailto:Spurgeon@pbworld.com]  
**Sent:** Tue 12/1/2009 2:03 PM  
**To:** Matley, Ted (FTA)  
**Cc:** Faith Miyamoto (Honolulu DTS) (fmiyamoto@co.honolulu.hi.us)  
**Subject:** Honolulu 106 PA

Ted,  
Faith asked that I provide you the proposed-Final PA and the HHF comments matrix with responses and provide some background on questions about the APE maps.

Also,  
Regarding the APE maps. The APE maps were provided to SHPD for concurrence in 2007. The SHPD accepted the APE in February 2008. Any changes to boundaries or resources on those maps would be inappropriate, as it would place into question all of the 106 process, which has been approved by the SHPD and has been open to the consulting parties. We are adding a solid boundary line around the APE. I am removing the extensions from the cover sheet. If FTA requests, we can delete the sheets for Salt Lake, but my preference would be to keep them, since at the time of the Draft EIS, when eligibility was determined, the Salt Lake alignment was included in that determination. We have confirmed the boundaries for historic districts, but are not going to change boundaries for proposed districts, as the proposed boundaries were accepted by the SHPD (see below).

Regarding the Makalapa Gate area at Pearl Harbor. The Makalapa Housing is not a NR district. During our Section 106 consultation, we determined in consultation with the SHPD that it was eligible, and we included a proposed boundary for two potential districts encompassing two neighborhoods (Makalapa and Little Makalapa). The Navy was provided a copy of the proposal, to which they did not comment. The SHPD accepted our proposed boundaries as appropriate for an eligible district (they concurred on eligibility). This was shared with all consulting parties, and none questioned it. At a recent meeting with the Navy (regarding the Administrative Final EIS) they showed us a figure of a draft boundary that they are using internally for management of historic resources that combines both areas into one. We were told that the internal management plan was still draft and not adopted, and that the proposed boundary had not been submitted for national register listing. Based on that, the transit project proceeded using the boundary that had been accepted by the SHPD. Our opinion was that if the Navy submitted their internal boundary for listing to the national register, then the transit project would adopt that boundary, until that time, the only appropriate boundary was the one that had been identified through the Section 106 process and accepted by the SHPD as eligible for listing.

Let me know if you need anything else.

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